

David B. Owens
 California Bar No. 275030
david@loevy.com
 Loevy & Loevy
 100 S. King St., Ste 100
 Seattle, WA 98104
 Counsel for Plaintiff Paul Browning

Luke A. Busby, ESQ
 Nevada Bar No. 10319
 Luke Andrew Busby, Ltd.
 316 California Ave # 82
 Reno, Nevada 89509
luke@lukeandrewbusbyltd.com
 Designated Resident Nevada Counsel for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA (LAS VEGAS)	
BROWNING, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> LAS VEGAS METROPOLITAN POLICE DEPARTMENT et al., <p style="text-align: center;">Defendants.</p>	Case No. 2:20-CV-01381-KJD-VCF <p style="text-align: center;">STIPULATION AND ORDER TO EXTEND DEADLINE FOR RESPONSE TO (REFILED) DISPOSITIVE MOTION</p> <p style="text-align: center;">(Third Request)</p>

Now comes Betty Browning, Administrator of the Estate of Paul Browning, and Defendants, by and through their respective undersigned counsel, hereby and stipulate and agree that the response deadline for Plaintiff's response to Defendants' motion for summary judgment should be extended, and state as follows:

1 1. Defendants filed a 54-page motion for summary judgment on June 16,
2 2023. Dkt. 81. (The motion was refiled after Plaintiff amended the complaint to add
3 Nevada state constitutional claims.)

4 2. Under the schedule set by the Court, Plaintiff's response to the motion
5 was due on July 17, 2023. Dkt. 78.

6 3. The parties subsequently stipulated to an extension of one week for
7 Plaintiff to file her response to Defendants' Motion for Summary Judgment, due to
8 conflicting deadlines in other cases to which Plaintiff's counsel is obligated to meet.
9 The Court granted the stipulation. Dkt. 83.

10 4. The parties stipulated to a second extension of one week, until July 31,
11 2023, primarily due to a deposition that Plaintiff's counsel, Elizabeth Wang,
12 unexpectedly had to take on July 24, 2023. The Court granted the stipulation. Dkt.
13 85.

14 5. Plaintiff did not foresee a third extension being necessary; however,
15 due to the tragic and sudden death of one of undersigned counsel's (David B.
16 Owens') current clients, a third request for a three-day extension is being made.

17 6. A three-day extension will allow undersigned counsel time to grieve
18 the loss of a dear client and friend, who undersigned counsel not only has a
19 professional relationship with, but also a personal connection to, as this client lived
20 down the street from where undersigned counsel grew up.

21 7. Plaintiff requests a new deadline of August 3, 2023. Accordingly, the
22 parties also stipulate that Defendants' reply deadline be extended to August 17,
23 2023.

24 8. The reasons stated above, as well as the extensive length and nature of
25 the dispositive motion itself, constitute good cause. This request is made as a good
26 faith effort to complete Plaintiff's response thoroughly and responsibly; without a
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1 brief period for counsel to commit time to the bereaved family as well as to grieve
2 his own loss, counsel is unable to complete the task at hand.

3 9. This request is not being submitted to unduly delay or prejudice any
4 party but, rather, to ensure that Plaintiff has an adequate opportunity to present a
5 fulsome response to Defendants' 54-page motion seeking the entire dismissal of this
6 important civil rights suit.

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9 Respectfully submitted,

10 /s/ David B. Owens
11 David B. Owens
12 Counsel for Plaintiff

13 /s/ Craig R. Anderson
14 Craig R. Anderson
Counsel for Defendants

15 David B. Owens*
16 California Bar No. 275030
17 david@loevy.com
18 Loevy & Loevy
19 100 S. King St., Ste 100
Seattle, WA 98104
Counsel for Plaintiff

20 Elizabeth Wang*
21 Loevy & Loevy
22 2060 Broadway, Ste. 460
23 Boulder, CO 80302
Counsel for Plaintiff
24 *Admitted pro hac vice

25 Luke A. Busby, ESQ
26 Nevada Bar No. 10319
27 Luke Andrew Busby, Ltd.
316 California Ave # 82
28 Reno, Nevada 89509
luke@lukeandrewbusbyltd.com

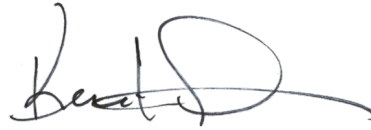
1 *Designated Resident Nevada Counsel for Plaintiff*

2 Craig R. Anderson, Esq.
3 Marquis Aurbach Coffing
4 Nevada Bar No. 6882
5 10001 Park Run Dr.
6 Las Vegas, NV 89145
7 *Counsel for Defendants*

8 ORDER

9 IT IS SO ORDERED that, based on the parties' Stipulation, and for good
10 cause as described therein, Plaintiff's response to Defendants' motion for summary
11 judgment will be due on August 3, 2023.

12 Date: 7/27/2023



13 United States District Judge
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Certificate of Service

I, David B. Owens, an attorney, certify the foregoing was filed on July 26, 2023 via the Court's electronic filing system, which effected service on all counsel of record.

/s/ David B. Owens